


# Exhibit A

STATE OF RHODE ISLAND AND  PROVIDENCE PLANTATIONS**SUPERIOR COURT****SUMMONS**

<b>Plaintiff</b> Barbara Paige v. <b>Defendant</b> Rhode Island Public Transit Authority	<b>Civil Action File Number</b> PC-2018-3911 <b>Attorney for the Plaintiff or the Plaintiff</b> Sonja L. Deyoe <b>Address of the Plaintiff's Attorney or the Plaintiff</b> LAW OFFICES OF SONJA L DEYOE 395 SMITH STREET PROVIDENCE RI 02908
Light Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250	<b>Address of the Defendant</b> Giovanni P Stanziale 705 Elmwood Avenue Providence RI 02907

**TO THE DEFENDANT, Rhode Island Public Transit Authority:**

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 6/5/2018.

/s/ Henry Kinch  
Clerk

Witness the seal/watermark of the Superior Court

*True copy attst*  
*6/6/18*  
*[Signature]*  
*Case # 18-00347*

STATE OF RHODE ISLAND AND  PROVIDENCE PLANTATIONS

**SUPERIOR COURT**

**Plaintiff**

Barbara Paige

v.

**Defendant**

Rhode Island Public Transit Authority

**Civil Action File Number**

PC-2018-3911

**PROOF OF SERVICE**

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Rhode Island Public Transit Authority, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.  
Name of person of suitable age and discretion \_\_\_\_\_  
Address of dwelling house or usual place of abode \_\_\_\_\_  
Age \_\_\_\_\_  
Relationship to the Defendant \_\_\_\_\_
- ☐ With an agent authorized by appointment or by law to receive service of process.  
Name of authorized agent \_\_\_\_\_  
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.  
\_\_\_\_\_
- ☐ With a guardian or conservator of the Defendant.  
Name of person and designation \_\_\_\_\_
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.  
Name of person and designation \_\_\_\_\_

STATE OF RHODE ISLAND AND  PROVIDENCE PLANTATIONS

## SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation \_\_\_\_\_

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation \_\_\_\_\_

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent \_\_\_\_\_

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: \_\_\_\_\_SERVICE DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_  
Month Day Year

SERVICE FEE \$ \_\_\_\_\_

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature \_\_\_\_\_

State of \_\_\_\_\_

County of \_\_\_\_\_

On this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, before me, the undersigned notary public, personally appeared \_\_\_\_\_ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was \_\_\_\_\_, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: \_\_\_\_\_

My commission expires: \_\_\_\_\_

Notary identification number: \_\_\_\_\_

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Case Number: PC-2018-3911  
Filed In: Providence/Bristol County Superior Court  
Submitted: 6/4/2018 12:32:11 PM  
Envelope: 1569084  
Reviewer: Lynn G.

STATE OF RHODE ISLAND  
PROVIDENCE, S.C.

SUPERIOR COURT

BARBARA PAIGE,  
Plaintiff

VS.

C.A. No.:

RHODE ISLAND PUBLIC TRANSIT AUTHORITY,  
Defendant

**COMPLAINT**

Plaintiff brings this claim against Rhode Island Public Transit Authority (RIPTA), alleging that it has violated the American's with Disabilities Act and similar state laws by wrongfully terminating her from employment and denying her a reasonable accommodation.

1. The Plaintiff, Barbara Paige, is a resident of the City of Cranston, County of Providence, State of Rhode Island at all times relevant hereto. She is African American, a women, and born in the year 1954.
2. The Defendant, Rhode Island Public Transportation Authority (RIPTA), with its place of business located in Providence, Rhode Island, employed the Plaintiff at all times relevant hereto.
3. The Plaintiff was hired by the Defendant as a Driver, and worked in that capacity until she was transferred to an inactive status on July 6, 2017.
4. Plaintiff was later informed by Defendant's counsel on October 9, 2017 that she was in fact terminated with this reassignment.
5. On or about May 19, 2016, Plaintiff went out of work for a left shoulder injury which constitutes a disability in as much as it affected her ability to use the limb for almost a year, caused her great pain with lifting and range of motion, and otherwise required surgery to fix.
6. Plaintiff was medically cleared and returned to work on or around May 4, 2017 and again on June 19, 2017, per a note submitted to the Defendant on June 1, 2017.

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7. Plaintiff sent a request for accommodations to the Defendant on June 2, 2017 indicating that she had received a return to work note that allowed her to work for four hours in her position.
8. Defendant denied the request. In so doing Defendant did not enter into any interactive process with the plaintiff which would have allowed her to work other positions with the Plaintiff.
9. Plaintiff is a union member with rights to reassignment and placement, per her contract.
10. Plaintiff filed a charge with the Rhode Island Commission for Human Rights and EEOC and on December 11, 2017 the Rhode Island Commission for Human Rights issued a notice of suit rights. This Complaint is filed within 90 days of issuance of the Right to Sue letter.

**COUNT I-IV.**

**Violation of The American's With Disabilities Act**

**Rhode Island Person's with Disabilities Act**

**R.I.G.L. § 28-5-1 et seq., and R.I.G.L. 42-112-1 et seq.,**

**(Discharge from position and denial of reasonable accommodations).**

11. The Plaintiff re-alleges the allegations in paragraphs one through ten of the complaint as set forth in full herein.
12. Defendant denied the Plaintiff reasonable accommodation and failed to engage in an interactive process with her to determine what accommodations she needed to perform the duties of her position, which would have allowed her to keep working.
13. Defendant wrongfully and unlawfully terminated Plaintiff and engaged in wrongful and intentional discrimination against Plaintiff on the basis of her disability by denying her a reasonable accommodation, namely accommodating Plaintiff's work-related hand injury by allowing her to transfer internally to a more suitable/less physically demanding position to continue working for Defendant.
14. As a direct and proximate result of the Defendant's discriminatory actions, the Plaintiff has suffered financial harm, emotional distress, and loss of her position.

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WHEREFORE, Plaintiff respectfully demands judgment against the Defendant in an amount to be determined by this litigation, together with interest, attorney's fees, cost, punitive damages, and other relief this court deems just and fit.

Plaintiff,  
By her attorney,

/s/ Sonja L. Deyoe  
Sonja L. Deyoe, Esq. 6301  
Law offices of Sonja L. Deyoe  
395 Smith Street  
Providence, RI 02908  
(401) 864-5877  
(401) 354-7464 (fax)

Dated: June 4, 2018



Case Number: PC-2018-3911  
Filed in Providence/Bristol County Superior Court  
Submitted: 6/4/2018 12:32:11 PM  
Envelope: 1569084  
Reviewer: Lynn G.

STATE OF RHODE ISLAND  
PROVIDENCE, S.C.

SUPERIOR COURT

BARBARA PAIGE,  
Plaintiff

VS.

C.A. No.:

RHODE ISLAND PUBLIC TRANSIT AUTHORITY,  
Defendant

**JURY DEMAND**

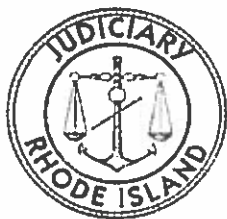
Plaintiff hereby demands jury trial on all counts so triable.

Dated: 6/4/18

Plaintiff, by her attorneys,

*/s/ Sonja L. Deyoe*  
Sonja L. Deyoe, 6301  
Law Offices of Sonja L. Deyoe  
395 Smith Street  
Providence, RI 02908  
(401) 864-5877  
[sld@the-straight-shooter.com](mailto:sld@the-straight-shooter.com)

See this notice in Cambodian, Spanish, and Portuguese on the attached pages.  
**Español:** Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.  
**Português:** Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



## NOTICE

**You have a case in the Rhode Island state court system.**

**You have the right to an interpreter at no cost to you.**

Rhode Island Supreme Court Executive Order 2012-05 states that when a Limited-English Proficient (LEP) person appears in court, the Rhode Island Judiciary will provide a free authorized interpreter for the defendant, plaintiff, witness, victim, parent of a juvenile, or someone with a significant interest in the court proceeding. This interpreting service is provided at no cost to the parties and in all types of cases, both civil and criminal. Court interpreters work in all the courthouses of the Rhode Island state court system.

**To schedule an interpreter for your day in court, you have the following options:**

1. Call the Office of Court Interpreters at (401) 222-8710, or
2. Send an email message to [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov), or
3. Visit the interpreters' office to schedule an interpreter:

The Office of Court Interpreters  
Licht Judicial Complex  
Fourth Floor, Room 401  
250 Benefit Street  
Providence, RI 02903

**When requesting an interpreter, please provide the following information:**

- The name and number of your case
- The language you are requesting
- The date and time of your hearing
- The location of your hearing
- Your name and a telephone number where we can reach you or your lawyer

For more information in Portuguese, Russian, and Spanish, including a listing of court forms that are available in Spanish, please visit our website on the internet:

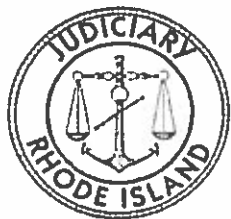
<http://www.courts.ri.gov/Interpreters/englishversion/default.aspx>.

To request a translation of this notice into any other language, please call the Office of Court Interpreters at (401) 222-8710. It would be helpful to have an English speaker with you when you call.

The Rhode Island Judiciary is committed to making the courts accessible to all.

The Office of Court Interpreters  
Licht Judicial Complex  
Fourth Floor Room 401  
250 Benefit Street  
Providence, RI 02903

See this notice in Cambodian, Spanish, and Portuguese on the attached pages.  
Español: Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.  
Português: Leia esta notificação em cambojano, espanhol e português nas páginas em anexo.



## AVISO

**Usted tiene un caso en el sistema judicial de Rhode Island.**

**Usted tiene el derecho a tener un intérprete sin costo para usted.**

La Orden Ejecutiva 2012-05 del Tribunal Supremo de Rhode Island dicta que cuando una persona que tiene un dominio limitado del inglés (LEP) comparece ante la corte, el Sistema Judicial de Rhode Island le proveerá un intérprete autorizado gratis sea el acusado/demandado, demandante, testigo, víctima, padre de un menor de edad alguien que tenga con un interés importante en el proceso de la corte. Este servicio de interpretación se le proveerá sin costo alguno a los participantes en toda clase de caso, sea civil o penal.

Los intérpretes judiciales trabajan en todos los tribunales del Sistema Judicial de Rhode Island.

**Para solicitar un intérprete para su comparecencia en el tribunal, usted tiene las siguientes opciones:**

1. Llamar a la Oficina de Intérpretes en el tribunal al 401-222-8710 ;
2. Mandar un correo electrónico a [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov); o
3. Presentarse a la Oficina de Intérpretes para solicitar un intérprete:

The Office of Court Interpreters  
Licht Judicial Complex  
Cuarto Piso, Oficina 401 A-B  
250 Benefit Street  
Providence, RI 02903

**Al solicitar un intérprete, por favor provea la siguiente información:**

- El nombre y el número de su caso
- El idioma que solicita
- La fecha y hora de su audiencia
- Dónde va a tomar lugar su audiencia
- Su nombre y número de teléfono por el cual nos podamos poner en contacto con usted o con su abogado.

Para obtener más información en portugués, ruso o español, incluyendo una lista de formularios de la corte que están disponibles en español, visite nuestra página de internet:

<http://www.courts.ri.gov/Interpreters/englishversion/default.aspx>

Para solicitar la traducción de este aviso en cualquier otro idioma, por favor llame a la oficina de intérpretes al (401) 222-8710. Ayudaría si usted puede estar en compañía de una persona que habla inglés cuando llame.

El sistema jurídico de Rhode Island se compromete a proporcionar a todas las personas mejor acceso a los tribunales.

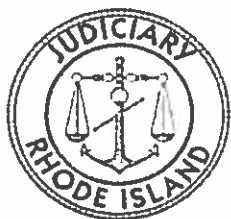
The Office of Court Interpreters  
Licht Judicial Complex  
Fourth Floor Room 401  
250 Benefit Street  
Providence, RI 02903

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**Camboyano:** SAMPLE: [Véase esta notificación en camboyano, español y portugués en las páginas adjuntas.]

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**Português:** Leia esta notificação em camboyano, espanhol e português nas páginas em anexo.



## NOTIFICAÇÃO

**V. Ex.<sup>a</sup> tem um processo em curso no sistema judiciário do Estado de Rhode Island,**

**V. Ex.<sup>a</sup> tem direito aos serviços gratuitos de um intérprete.**

A Ordem Executiva 2012-05 do Supremo Tribunal de Rhode Island prevê que quando uma pessoa com conhecimentos limitados da língua inglesa (*Limited-English Proficient*) (LEP) comparece em tribunal, a Administração Judiciária de Rhode Island disponibiliza-lhe gratuitamente os serviços de um intérprete autorizado a um réu, autor, testemunha, vítima, pai ou mãe de um menor ou alguém com interesse significativo no processo judicial. O serviço de intérprete é prestado gratuitamente às partes e em todos os tipos de processos, sejam eles civis ou penais. Os intérpretes do tribunal trabalham em todos os tribunais do sistema judiciário do Estado de Rhode Island.

**Para agendar os serviços de um intérprete para o seu dia no tribunal, tem as seguintes opções:**

1. **Telefonar para o Gabinete de Intérpretes Judiciais através do n.º (401) 222-8710, ou**
2. **Enviar uma mensagem de correio eletrónico para [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov), ou**
3. **Deslocar-se ao gabinete de intérpretes para agendar os serviços de um intérprete:**

Gabinete de Intérpretes Judiciais  
Complexo Judicial Licht  
Quarto Piso, Sala 401  
250 Benefit Street  
Providence, RI 02903

**Quando solicitar os serviços de um intérprete deve fornecer os seguintes dados:**

- O nome e número do seu processo
- O idioma que solicita
- A data e hora da sua audiência
- O local da sua audiência
- O seu nome e um número de telefone para o podermos contactar a si ou ao seu advogado

Para obter mais informações em português, russo e espanhol, incluindo uma lista dos formulários judiciais disponíveis em espanhol, visite o nosso website na internet: <http://www.courts.ri.gov/interpreters/englishversion/default.aspx>.

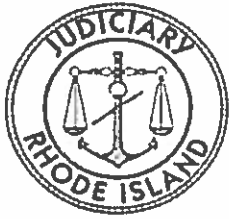
Para solicitar uma tradução desta notificação para qualquer outro idioma, telefone para o Gabinete de Intérpretes Judiciais através do número (401) 222-8710. Recomenda-se que esteja acompanhado por alguém que fale inglês quando fizer a chamada.

A Administração Judiciária de Rhode Island está empenhada em tornar os tribunais acessíveis para todos.

Gabinete de Intérpretes Judiciais  
Complexo Judicial Licht  
Quarto Piso, Sala 401  
250 Benefit Street  
Providence, RI 02903

មើលសេចក្តីជូនដំណឹងនេះជាភាសាខ្មែរ អេស្បាញ និងក៏ទុយហ្គីលនៅលើទំព័រដែលបានភ្ជាប់។

**សេចក្តីជូនដំណឹង**



**លោកអ្នកមានបណ្តឹងនៅក្នុងប្រព័ន្ធតុលាការនៃរដ្ឋ Rhode Island។**

**លោកអ្នកមានសិទ្ធិស្នើសុំអ្នកបកប្រែដោយឥតគិតថ្លៃសម្រាប់ខ្លួនឯង។**

ដីកាប្រតិបត្តិរបស់តុលាការកំពូលនៃ Rhode Island (Rhode Island Supreme Court Executive Order) លេខ 2012-05 បានចែងថានៅពេលបុគ្គលដែលមានចំណេះដឹងផ្នែកភាសាអង់គ្លេសមានកំណត់ (LEP) បង្ហាញខ្លួននៅក្នុងតុលាការ តុលាការនៃ Rhode Island នឹងផ្តល់អ្នកបកប្រែដែលបានអនុញ្ញាតដោយឥតគិតថ្លៃសម្រាប់ចុងចោទ ដើមចោទ សាក្សី ជនរងគ្រោះ

មាតាបិតារបស់អធិបតីជន ឬនរណាម្នាក់ដែលពាក់ព័ន្ធយ៉ាងសំខាន់នៅក្នុងដំណើរការតុលាការ។ សេវាកម្មបកប្រែនេះ ត្រូវបានផ្តល់ជូនដោយឥតគិតថ្លៃសម្រាប់គ្រួសារ និងនៅក្នុងប្រភេទនៃបណ្តឹង ចំណេញប្រាក់ និងប្រព័ន្ធបណ្តាញ។ អ្នកបកប្រែក្នុងតុលាការធ្វើការនៅក្នុងគ្រប់តុលាការទាំងអស់របស់ប្រព័ន្ធតុលាការនៃរដ្ឋ Rhode Island។ ដើម្បីគ្រោងពេលវេលាអ្នកបកប្រែសម្រាប់ថ្ងៃចូលសវនាការរបស់លោកអ្នក លោកអ្នកមានជម្រើសដូចខាងក្រោម ៖

1. ទូរស័ព្ទមកកាន់ការិយាល័យអ្នកបកប្រែប្រចាំតុលាការតាមរយៈលេខ (401) 222-8710 ឬ
2. ផ្ញើអ៊ីមែលទៅកាន់ [interpreterfeedback@courts.ri.gov](mailto:interpreterfeedback@courts.ri.gov) ឬ
3. ទៅកាន់ការិយាល័យអ្នកបកប្រែដើម្បីគ្រោងពេលវេលាអ្នកបកប្រែ ៖

**The Office of Court Interpreters  
Licht Judicial Complex  
Fourth Floor, Room 401  
250 Benefit Street  
Providence, RI 02903**

នៅពេលស្នើសុំអ្នកបកប្រែ សូមផ្តល់នូវព័ត៌មានដូចខាងក្រោម ៖

- ឈ្មោះ និងលេខបណ្តឹងរបស់លោកអ្នក
- ភាសាដែលលោកអ្នកស្នើសុំ
- កាលបរិច្ឆេទ និងម៉ោងសវនាការរបស់លោកអ្នក
- ទីតាំងនៃសវនាការរបស់លោកអ្នក
- ឈ្មោះ និងលេខមូលដ្ឋានលោកអ្នកដែលយើងខ្ញុំអាចទំនាក់ទំនងលោកអ្នក ឬមេធាវីលោកអ្នកបាន

សម្រាប់ព័ត៌មានបន្ថែមជាភាសាអង់គ្លេស រុស្ស៊ី និងអេស្បាញ រួមទាំងបញ្ជីទម្រង់បែបបទតុលាការដែលមានជាភាសាអេស្បាញនោះ សូមចូលទៅកាន់គេហទំព័រយើងខ្ញុំនៅលើអ៊ីនធឺណិត ៖

<http://www.courts.ri.gov/Interpreters/englishversion/default.aspx>

ដើម្បីស្នើសុំការបកប្រែសេចក្តីជូនដំណឹងនេះជាភាសាណាមួយផ្សេងទៀត សូមទូរស័ព្ទមកការិយាល័យអ្នកបកប្រែប្រចាំតុលាការតាមរយៈលេខ (401) 222-8710។ វាជាការចាំបាច់ដែលត្រូវមានអ្នកនិយាយភាសាអង់គ្លេសជាមួយលោកអ្នកនៅពេលដែលលោកអ្នកទូរស័ព្ទចូល។

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